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*Counsel to Alfred H. Siegel,
Trustee of the Circuit City Stores, Inc.
Liquidating Trust*

*Counsel to Alfred H. Siegel, Trustee of the
Circuit City Stores, Inc. Liquidating Trust*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:) Case No. 08-35653 (KRH)
)
CIRCUIT CITY STORES, INC., <i>et al.</i> ¹ ,) Chapter 11
)
Debtors.) (Jointly Administered)
)

**NOTICE OF FILING OF (A) TRUSTEE'S MOTION FOR ORDER GRANTING
CLAIMANT UNICAL ENTERPRISES, INC. RELIEF FROM THE PLAN
INJUNCTION SOLELY TO THE EXTENT NECESSARY TO PROSECUTE
ITS PENDING APPEAL TO COMPLETION AND (B) HEARING THEREON**

PLEASE TAKE NOTICE THAT the Circuit City Stores, Inc. Liquidating Trust (the "Trust"), through its Trustee, Alfred H. Siegel has filed the TRUSTEE'S MOTION FOR ORDER GRANTING CLAIMANT UNICAL ENTERPRISES, INC. RELIEF FROM THE PLAN INJUNCTION SOLELY TO THE EXTENT NECESSARY TO PROSECUTE ITS PENDING APPEAL TO COMPLETION (the "Motion") with the United States Bankruptcy Court for the Eastern District of Virginia (the "Bankruptcy Court").

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of their respective federal tax identification numbers are as follows: Circuit City Stores, Inc. (3875), Circuit City Stores West Coast, Inc. (0785), InterTAN, Inc. (0875), Ventoux International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821), Circuit City Properties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapsco Designs, Inc. (6796), Sky Venture Corp. (0311), Prahs, Inc. (n/a), XSStuff, LLC (9263), Mayland MN, LLC (6116), Courchevel, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512). The current address for these entities is 200 Westgate Parkway, Suite 100, Richmond, VA 23233.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult one). Under the case Management Order (as defined hereafter) and Local Bankruptcy Rule 9013-1, unless a written response to the Motion is filed with the Clerk of Court and served on the moving party within three (3) days before the scheduled hearing date, the Court may deem any opposition waived, treat the Motion as conceded, and issue and order granting the relief requested.

PLEASE TAKE FURTHER NOTICE THAT in connection with the Debtors' Chapter 11 Cases, a Supplemental Order Establishing Certain Notice, Case Management and Administrative Procedures [Docket No. 6208] (the "Case Management Order") was entered by the Court on December 30, 2009, which, among other things, prescribes the manner in which objections must be filed and served and when hearings will be conducted. A copy of the Case Management Order may be obtained at no charge at www.kccllc.net/circuitcity or for a fee via PACER at <http://www.vaeb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE that on **February 20, 2014 at 2:00 p.m. (ET)** (or such time thereafter as the matter may be heard) the undersigned will appear before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in room 5000, of the United States Courthouse, 701 E. Broad Street, Richmond, Virginia 23219, and will move the Court for entry of an order approving the Motion.

If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then within three (3) days before the hearing date you or your attorney must:

- ☒ File with the Court, at the address shown below, a written response with supporting memorandum pursuant to Local Bankruptcy Rule 9013-1 and the Case Management Order. You must mail or otherwise file it early enough so the Court will **receive** it on or before the due date identified herein.

Clerk of the Court
United States Bankruptcy Court
701 E. Broad Street, Suite 40000
Richmond, VA 23219

You must also serve a copy on:

Lynn L. Tavenner
Tavenner & Beran, PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219

Robert B. Van Arsdale, Esquire
Office of the United States Trustee
701 East Broad Street, Suite 4304
Richmond, Virginia 23219

If you or your attorney do not take these steps, the Court may deem any opposition waived, treat the Motion as conceded, and issue orders granting the requested relief without further notice or hearing.

Dated: February 4, 2014

/s/ Lynn L. Tavenner

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*Counsel to Alfred H. Siegel, Trustee of the
Circuit City Stores, Inc. Liquidating Trust*

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of February, 2014, a true and correct copy of the foregoing **Notice of Filing of (a) Trustee's Motion for Order Granting Claimant Unical Enterprises, Inc. Relief From the Plan Injunction to the Extent Necessary to Prosecute Its Pending Appeal to Completion and (b) Hearing Thereon** was served electronically through the Court's CM/ECF System to the following:

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/s/ Lynn L. Tavenner
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